



UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

(1) CHARLES ALBERT WALKER,
(2) CORTEZ DEONTE MOULTRIE

Case:2:15-mj-30196

Judge: Unassigned,

Filed: 04-22-2015 At 10:17 AM

USA V CHARLES ALBERT WALKER, ET AL.

(CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 20, March 25, and April 20, 2015 in the county of Wayne-Oak.-Macomb in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. sec. 2113(a)

Bank Robbery (three counts)

18 U.S.C. sec. 924(c)

Brandishing a firearm during and in relation to a crime of violence (three counts)

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

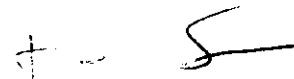

Complainant's signature

Todd Hunt, FBI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: April 22, 2015


Judge's signature

City and state: Detroit, Michigan

R. Steven Whalen, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Task Force Officer Todd Hunt, being duly sworn state the following is true and accurate to the best of my knowledge and belief:

1. I am a Law Enforcement Officer employed by the Oakland County Sheriff's Office with over 20 years of law enforcement experience. I am currently assigned to the Federal Bureau of Investigation's Oakland County Gang and Violent Crime Task Force (FBI - OCGVCTF). During the course of my career, I have been involved in numerous criminal investigations involving the violation of both state and federal law, including matters involving bank robbery.
2. I make this affidavit from personal knowledge based on my participation in this investigation, communications with others who have personal knowledge of the events and circumstances described herein, review of police reports, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and it therefore does not contain all details or all facts of which I am aware relating to this investigation.

3. Your Affiant, along with other law enforcement officers, is currently investigating three separate bank robberies that occurred in the Metro Detroit area – Brownstown Township, Wayne County on January 20, 2015; Pontiac, Oakland County on March 25, 2015; and Harrison Township, Macomb County on April 20, 2015. All three incidents were committed by two subjects of similar description and modus operandi (MO).
4. On January 20, 2015, at approximately 0955, two unknown subjects robbed the Key Bank, located at 23116 Telegraph Road, Brownstown, Michigan. The two males were described as follows: suspect #1 – black male, 6’4” – 6’5”, large build, in his 30s; and suspect #2 – lighter skinned male, 5’11” slender build. The two men entered the bank, produced handguns, and ordered everyone in the bank onto the floor. Suspect #1 concentrated on the vault area while suspect #2 stole money from the teller area. Both subjects had their heads covered as well as their faces partially covered. A cell phone belonging to a customer was stolen during the robbery and a suspect vehicle, a GMC/ Chevrolet Savannah type conversion van, was identified. Over \$40,000.00 was reported stolen by the Key Bank.
5. On March 25, 2015, at approximately 0924, two unknown subjects robbed the Huntington National Bank located at 1821 N. Perry, Pontiac, Michigan. The two males were described as follows: suspect #1 – black male, 6’2” –

6'3" 240 - 250 lbs, wearing a hoodie with a bandanna; and suspect #2, light skinned black male, thin build, wearing a hoodie and bandanna. The two men entered the bank, produced a handgun, and ordered the employees onto the floor. Over \$17,000.00 was reported stolen as well as the cell phone of one of the tellers. A gold/ tan conversion van was identified as a possible suspect vehicle by witnesses.

6. On April 20, 2015, at approximately 1116, two subjects, later identified as CHARLES ALBERT WALKER, date of birth 06/**/87 and CORTEZ DEONTE MOULTRIE, date of birth 11/**/89, entered the Comerica Bank located at 35320 Jefferson Avenue, Harrison Township, Michigan.

Witnesses reported that the two subjects entered the bank wearing masks and ordering everyone onto the ground. Both subjects were observed on video tape holding handguns. One of the subjects, the larger of the two, pointed a handgun at the manager's head and ordered him to open the vault. While in the vault, WALKER threatened to kill the manager. Both subjects fled the bank with over \$130,000.00.

7. Witnesses provided a description of the suspect vehicle, a brown van, and a possible suspect vehicle was soon observed by responding units and an attempt was made to conduct a traffic stop. The van failed to stop and led law enforcement officers on a vehicle pursuit before being terminated by a

PIT maneuver in the area of I-94 and Little Mack in Macomb County. Three Macomb County vehicles sustained damage during this incident.

8. The driver of the vehicle, identified as WALKER, fled from the vehicle on foot and was apprehended after a short pursuit.
9. MOULTRIE, the front seat passenger, was arrested inside of the vehicle.
10. Two handguns were recovered from inside of the vehicle, one, a Ruger .380, was found in the jacket associated by the investigation with MOULTRIE and the other one, a Glock .22 handgun, was located on the driver's seat.
11. A large amount of U.S. currency was located inside the Chevrolet 1500 full sized conversion van. Some of the money was identified as bait money stolen from the Comerica Bank.
12. WALKER was interviewed by Detective Fraser of the Macomb County Sheriff's Office in the Macomb County Jail and made the following post-*Miranda* statement:
 - a. WALKER stated that he met with MOULTRIE earlier in the day and the two of them drove around looking for a place to rob before selecting the Comerica Bank. WALKER entered the bank with MOULTRIE and ordered the occupants onto the floor at gunpoint. WALKER acknowledges that he fled from the Macomb County deputies in an attempt to "get away".

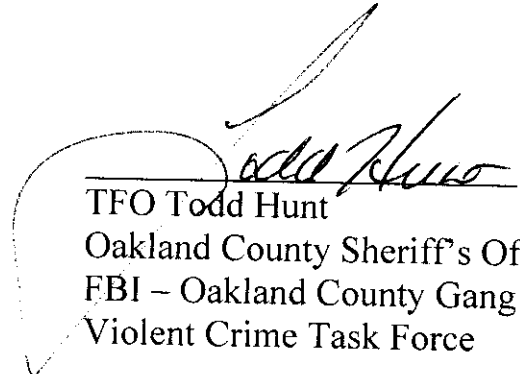
13. MOULTRIE was interviewed by Detective Fraser of the Macomb County Sheriff's Office in the Macomb County Jail and made the following post-*Miranda* statement:
 - a. MOULTRIE admitted that he participated in the robbery of the Comerica bank with WALKER. MOULTRIE denied having a handgun but did advise the Detective that there was a .380 handgun in the vehicle which he had purchased off of the "street".
14. On April 20, 2015, your affiant and Detective Marougi of the Oakland County Sheriff's Office interviewed CHARLES ALBERT WALKER at the Macomb County Jail. WALKER made the following statement:
 - a. WALKER and MOULTRIE robbed the Key Bank located in Brownstown Township. WALKER stated that they were both armed with handguns and stole approximately \$12,000.00 from the bank prior to fleeing.
 - b. WALKER and MOULTRIE robbed the Huntington National Bank located in Pontiac. WALKER stated that he did rack his handgun during the robbery. WALKER stated that they stole approximately \$7,000.00 during that robbery prior to fleeing.
 - c. WALKER and MOULTRIE entered a PNC Bank on April 20, 2015, approximately one hour prior to being arrested for the

robbery of the Comerica Bank. The PNC Bank was located in the area of Little Mack and 10/ 11 Mile. WALKER stated that, for an unknown reason, he decided not to rob this bank.

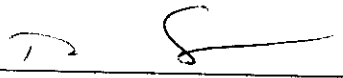
d. WALKER stated that he was the one who chose which banks to target for the robberies and that he was the one who drove to and from the robbery sites.

15. Your Affiant has reviewed the surveillance video of the Brownstown Township robbery, the surveillance video from the Pontiac robbery, and interviewed both WALKER and MOULTRIE in person. Based on all the evidence reviewed in this case, Affiant believes that all three robberies were committed by the same two subjects – WALKER and MOULTRIE.
16. The Key Bank, the Huntington National Bank, and Comerica Bank are all federally insured by the Federal Deposit Insurance Corporation and are all located within the Eastern District of Michigan.
17. Based on the above information, there is probable cause to believe CHARLES ALBERT WALKER and CORTEZ DEONTE MOULTRIE committed bank robbery, by force and violence, or by intimidation, and took money and property in the care, custody, control, management, or possession of a bank, in violation of 18 U.S.C. 2113; and did use, carry, and

brandish a firearm during and in relation to crimes of violence, in violation of 18 U.S.C. § 924(c).


TFO Todd Hunt
Oakland County Sheriff's Office
FBI – Oakland County Gang and
Violent Crime Task Force

Sworn and subscribed to
before me the 22 day of April, 2015



R. Steven Whalen
United States Magistrate Judge